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VIA ECF

June 15, 2022

The Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: GIAP RH 160 LLC v. CRI Holding Corp. et al, No. 1:21-cv-02489-DG-JRC

Dear Judge Gujarati:

We write pursuant to the Court's directive entered on June 9, 2022 for Plaintiff to file a letter indicating whether it intends to proceed with this action. We have contacted the Plaintiff who advises that Plaintiff fully intends to continue with the action and respectfully requests the Court grant a period of 30 days to obtain substitute counsel and that substitute counsel be permitted to respond to the pending motions to dismiss, for the following reason.

The current attorney of record for Plaintiff, Ryan Wilson Esq., was a partner at our firm when the case was filed, but as the Court was advised in a letter filed on April 13, 2022, ECF Doc. No. 59, Mr. Wilson's relationship with our firm ended but he remained as attorney of record for Plaintiff.

Our understanding of the Eastern District's procedures is that Mr. Wilson remained the attorney of record rather than the firm, and he continued in communication with all counsel on behalf of Plaintiff subsequent to his departure from the firm. We have been in communication with Mr. Wilson who initially advised that his intention was to continue representing Plaintiff upon his transition to a new firm. However, he subsequently advised that the transition was delayed, and most recently indicated that, due to unforeseen circumstances, he would be working to obtain substitute counsel for Plaintiff.

We understand that Mr. Wilson negotiated an extension of time to respond to the motions to dismiss with the moving parties, although a request for approval by the Court of the extension has not been filed.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Caroline Polisi'.

Caroline J. Polisi